

CGB-CC-1146

Received & Inspected

September 14, 2011

SEP 15 2011

FCC Mail Room

Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743
Attention: CGB Room 3-B431



Dear Commissioner,

We are petitioning the Commission to grant us an exemption from the Closed Captioning Requirement rules where compliance with these rules will result in an undue burden (47 C.F.R. § 79.1 (f)) on my company.

We are a video programming provider televising live sporting events mainly in the state of Montana. We only televise a limited number of sporting events in a year, and this year we are televising five Frontier Conference football games. Adding closed captioning would amount to a considerable financial burden of upwards of 20% of our total revenues to televise such games. Not only that, but the production trucks are located outside of the stadium, and the costs of running phone lines and buying a closed captioning encoder (to use for five events only) would be astronomical.

If technology advances sometime in the future, we would be happy to comply with Closed Captioning Requirement Rules (in fact we would consider it a great asset to our telecast). Unfortunately the raw costs for providing such services are too great for us in small-town America, and truly would result in an undue burden.

We look forward to your response. Sincerely,

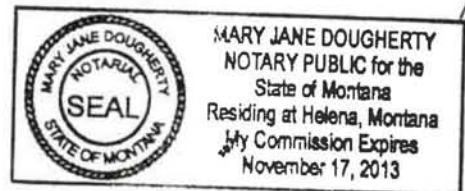
D. Martin Lyon
Managing Member
Lyon Group LLC

Sworn to and subscribed in my presence on this 14th day of September, 2011.

Notary Signature:

Notary name: Mary Jane Dougherty

Title: Notary Public for State of Montana



cc: Bruce Parker, Jon Saunders, Gregory MacDonald, Kathy Carrick, Paul Albertson